

Environmental Law and Justice Clinic

February 16, 2018

Derek J. Robinson
BRAC Environmental Coordinator
Department of the Navy
Base Realignment and Closure, Program Management Office West
33000 Nixie Way, Bldg. 50, Suite 207
San Diego, CA 92147

RE: Additional Witnesses to Tetra Tech's Fraud at HPNS

Dear Mr. Robinson,

By letter and email of January 30, 2018, we sent you a list of potential witnesses to Tetra Tech's fraudulent radiation remediation at the Hunters Point Naval Shipyard. We urged that they be interviewed by properly trained investigators so their knowledge of the fraud can be factored into cleanup planning, including the current planning to resample all of Tetra Tech's work.

As part of our ongoing investigation, we have identified five (5) additional witnesses who we believe are in a position to shed light on fraudulent activities at the Shipyard. They too should be interviewed. All worked at the on-site laboratory and ought to be asked about sample and data manipulation at the lab. They are:

**Neil Berrett
Wrey Berrett
Garland Berrett
Robin Fluty
Chris Fluty**

Our investigation continues and we may identify additional witnesses. If we do, we will bring them to your attention.

Finally, we have been seeking a meeting with you since last August. We would appreciate the courtesy of a reply.

Please contact me at your earliest opportunity.

Sincerely,



Steven J. Castleman
Visiting Associate Professor and ELJC Staff Attorney

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